

## **REMARKS**

Reconsideration of the present application is requested. Claims 1-36 are pending, with claims 1, 9 and 29 being independent.

## **DRAWINGS**

Applicants acknowledge the Examiner's acceptance of the drawings filed on February 25, 2004.

## **PRIORITY DOCUMENTS**

Applicants appreciate the Examiner's acknowledgement of Applicants' foreign priority claim under 35 USC §119 and the indication that all certified copies of the necessary priority documents have been received.

## **PRIOR ART REJECTIONS**

The Examiner rejects claims 1-36 under 35 USC §102(b) as allegedly being anticipated by U.S. Patent No. 6,213,391 ("*Lewis*"). This rejection is respectfully traversed.

*Lewis* fails to anticipate claim 1 because *Lewis* fails to assign "a role signature, assignable to a plurality of users," on the basis of a "performed security check," as required by claim 1. Absent this feature, *Lewis* cannot anticipate claim 1 and the rejection should be withdrawn. *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987); M.P.E.P. § 2131.

*Lewis* discloses transportable methods and systems for providing more accurate identification of a particular known or unknown person. *Lewis* at

col. 1. According to *Lewis*, a user inputs analog identification information (e.g., user's voice input) through input 12. *Id.* at col. 7, ll. 40-50. The input information is converted into a digital representation of the user's identification profile by a verifying means 2 to generate a random profile. *Id.* The verifying means 2 obtains an authorized profile associated with a particular secure objective (i.e., bank account) from a built-in storage medium 6, and compares the stored profile to the random profile. *Id.* at col. 8, ll. 10-14. If the random profile matches the authorized profile, the random profile is transmitted to code generator 5 via signal line 4. *Id.* at ll. 14-17. The code generator 5 converts the user's random profile to an access code associated with the secure objective. *Id.* at 36-45.

The Examiner relies upon the "access code," of *Lewis* to allegedly teach the "role signature," of claim 1. However, Applicants disagree with the Examiner's conclusion because the access code of *Lewis* is not "assignable to a plurality of users," as required by claim 1. To the contrary, the user's random or unique profile is converted into a particular access code for access to a particular secure objective. Therefore, the access code of *Lewis* could only arguably be assigned to a single user, but not "a plurality of users," as required by claim 1.

Moreover, the access code of *Lewis* is not assigned "on the basis of the performed security check," as required by claim 1. After verifying that the user's random profile matches a stored profile, the random profile is converted into an access code for accessing a particular secure objective. Thus, at most,

the "access code," of *Lewis* is generated based on a verification of the user's identity, but not assigned "on the basis of the performed security check," as required by claim 1.

Thus, *Lewis* fails to anticipate claim 1 because *Lewis* fails to teach or suggest at least the "role signature" of claim 1. Claims 9 and 29 are also allowable over *Lewis* for at least reasons somewhat similar set forth above with regard to claim 1. Claims 2-8, 10-15, 17-28 and 30-36 are in condition for allowance at least by virtue of their dependency from independent claims 1, 9 or 29.

### **CONCLUSION**

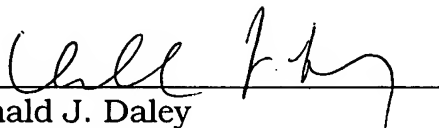
In view of the foregoing remarks, reconsideration and allowance of the claims of the present application is requested.

If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone Andrew M. Waxman, Reg. No. 56,007, at the number of the undersigned listed below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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